

ENSV FY07 Inspection Transmittal Form

Today's Date:
8/27/2007

INSPECTION ACTIVITY

Media RCRA Contractor	Type of Inspection CEI	Selection Criteria IA SQG	Compliance Officer Koesterer, B	Inspection Date 06/21/2007
Inspector BAH	Activity # 			

FACILITY INFORMATION

Facility Name Relco Locomotive	ID Number IAR000506105	NAICS/SIC Code 48821		
Address 1 Relco Way	City Albia	County Monroe	State IA	ZIP 52531

Facility Activity
support activities for rail transportation

INSPECTION FINDINGS

NOV/NOPF Issued? ☒ Yes ☐ No ☐ N/A

Potential SNC? ☐ Yes ☒ No ☐ N/A

Preliminary Findings (briefly list regulatory deficiencies)

40 CFR 262.34(c)(I) Failure to keep satellite accumulation container closed except when adding or removing waste.
40 CFR 262.34(5)(A, B & C) Failure to post name, telephone # of emergency coordinator and fire department and location of fire extinguisher and spill equipment.
40 CFR 262.34(a)(2) Failure to mark date of accumulation of containers in storage.



MULTIMEDIA FINDINGS

MM Participating Program*	MM Level	MM Type
		

Potential EJ? ☐ Yes ☒ No ☐ N/A

MM Screening completed? ☒ Yes ☐ No ☐ N/A

SBREFA handout provided? ☒ Yes ☐ No ☐ N/A

If yes, was MM Screening Checklist forwarded? ☒ Yes ☐ No

If yes, who? > ☐ CAA ☒ EPCRA/TSCA ☐ SPCC ☒ CWA ☐ UST ☐ PWS
☐ UIC ☒ Wetlands ☐ RCRA ☐ CFC ☐ EJ ☐ All

* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA,
U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS,
All, EMS = EMS

EMS? ☐ Yes ☒ No EMS ISO 14001 certified? ☐ Yes ☒ No

DOCUMENT CONTROL SHEET

DOCUMENT CONTROL CHECK SHEET

Media:

Air	RCRA	Water	Other
	X		

Date of Inspection: 6/21/07Facility/Site Name and Location: RELCO LOCOMOTIVE

IA KSMONE

1 RELCO WAY, ALBIA IA

X

DocumentYes No NA

Final Report w/attachments

73 Pages

(4) () ()

Field Sheets

0 Pages

() () (4)

Chain-of-Custody Records

0 Pages

() () (4)

Field Notes

6 Pages

(4) () ()

Analytical Data Sheets

0 Pages

() (4) ()

Photographic Negatives

0 Pages

() (4) ()

Photographs (not included w/report)

0 Pages

() (4) ()

Pre-inspection Packet

0 Pages

() (4) ()

Other Documents (list below)

(4) () ()

Photographic documentation1 ^{CD} Pages0 Pages0 Pages

(Note: If additional space is needed to list specific documents, use the reverse side of this page.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Cathy Dolan
Activity Leader's Signature

8/16/07
Date Signed

Relco

6/24/07

Wreck Repair, Rebuild, Custom loco mfg
Repair

* - Wreck Repair

- Wrecked loco's come in - do pre-inspection - strip unit down
- mechanical repair - wrecked parts are removed & exchanged w/ new parts
- fabricate or replace locomotive part
- using steel
 - plasma, sheer, acetylene
 - does not generate any used cutting oil yet / water based
- some get painted - depending on customer specification
- use Bondo filler putty - re-use directly from container
- most sanding is happens in paint booth + air filtration Clean System
- sandblast - high pressure water blasting for paint removal
- water collected in sludge pit
 - pumped to centrifuge

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- Centrifuge separates solids (paint, salts)
- goes to oil coalescer + settling tanks for further separation - water discharged to Sanitary sewer
 - - managed as hazardous waste
- Approx generation rate 58-gal ~ 2 months

- Starblast, starbright - Abrasive material goes to Centrifuge + on thru process
- re-use fuel - pump out + then replace when loco is repaired
- used oil / already drained sealed systems

* Rebuild

- Components removed - Anything that is a part of the locomotive running - repair or replace - quality parts that do not need repaired
- parts washers - when spent is ~~mixed~~ ~~with used oil~~ shipped off as non-haz
 - based on MSDS knowledge
- just adds new solvent - when needed. Contract person takes

6/21/07

Off site.

SANOBLOSC - has been in use for
6 months - has not ~~been~~ generated
Spent material up to this point.
- will make hazardous waste determination.

- Custom locomotive mfg
 - building from components,
engines + mechanical comes
in + fabricate loco
design to Specification
- Painting
 - 1 paint booth
solvent based paint
 - mixing paint for specific
system - pro-mix - mixed
in line
 - solvent cleaned - sprayed
into container for accumulation
 - rags get laundered thru Syntoss
 - Paint booth filters - thrown
into solid waste
 - main filters (lower half
gets generated approx 20
per month - overall 60

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in about 2-3 months

- not been tested, using process knowledge to be non-hazardous

Used oil generation

- oil based compressors engines - pumped into above ground tank - used oil filters disposed as solid waste

Universal waste

- not generated at this point -
- Locomotive batteries - sent for recycling
- Scrap metal
 - Collected in Roll Offs
 - Shrago - Scrap metal Recycling
- waste fuel - not ~~used~~ generated here - can't be moved to on site
 - dealt w/ before gets here

Visual Inspection

6/21/07

used oil tank - pulled
746 gallons last time - marked
as used oil / including fill
pipes

Centrifuge haz waste collection
system - open container

Satellite Accumulator - operated on Monday 6/18/07
last day used -
marked w/ identifying contents
open -

closed at time of inspection

<180-day storage area for
Centrifuge

55-gal container in storage

- not dated w/ beginning accumulator
date

1 55-gal container of used oil

- does not have emergency information
posted -

Paint booth area

1 - 55-gal container of waste
thinner, closed + labeled

Dean
Broderick
Sales-Technician

6 of 6

6/21/07

USEOIL - Valley Environmental Services
3330 Hwy S 74 S, Newton IA 50058
Approx 500 gal month

Scrap metal →

US EPA ID #

IAR 000506550

Transport # 0706050070/INP

Iowa DNR Permit # 05-A-932

DATwyler

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

RELCO LOCOMOTIVE

1 Relco Way
Albia, IA 52531
(641) 932-3030

EPA RCRA ID No. IAR000506105

ON

June 21, 2007

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division (ENSV) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on June 21, 2007, at Relco Locomotive (Relco) located in Albia, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that Relco is currently operating as a generator of between 100 kilograms (kg)(220 pounds) and 1,000 kg (2,200 pounds) of hazardous waste per month, less than 5,000 kg of universal waste at any one time, and a generator of used oil. At the quantities generated, Relco is classified as a small quantity generator of hazardous waste (SQG), a small quantity handler (SQH) of universal waste, and a used oil generator. The inspection was conducted as a level B Multimedia Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

PARTICIPANTS

The following person(s) participated in the inspection. A copy of the business card(s) was obtained and is included as Attachment 2.

Facility Representative, Relco:

Name	Title	e-mail/fax	Phone
Dave Crall	Director of Engineering	dcrall@relcolocomotives.com (641) 932-3375	(641) 932-3030
Kurt Datwyler	Production Supervisor	Neither one obtained	Not obtained

EPA Representative, Booz Allen Hamilton:

Name	Title	e-mail/fax	Phone
Cathy Dolan	Inspector	dolan_cathy@bah.com fax (816) 448-3850	(816) 448-3252

INSPECTION PROCEDURE

Prior to entering Relco, I conducted a visual reconnaissance of the facility grounds, searching for areas of concern observable from the adjacent roads. No environmental issues or concerns were identified during this preliminary examination.

I arrived at Relco at approximately 0835 hours, checked in with the receptionist and requested to speak with Mr. Kurt Datwyler, the listed environmental contact. The receptionist located Mr. Datwyler, and who along with Mr. Dave Crall greeted me and introduced themselves as the personnel providing environmental compliance. Messrs. Datwyler and Crall escorted me to Mr. Crall's office where I began the entry briefing and presented them with my credential letter, business card and copies of the following materials:

- 42 U.S.C. 1001 and 1002
- RCRA §3007(a) (stipulating hazardous waste inspection authority)
- EPA RCRIS *Handler Information Report*
- EPA *Notification of Regulation Waste Activity* booklet
- EPA *Publications for Small Business*
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*

- EPA *Managing your Hazardous Waste, a Guide for Small Business*
- EPA *Office of Enforcement and Compliance Assurance Information Sheet & US EPA Small Business Resources* handout
- Compliance Assistance Centers Handout
- Small Business Pollution Prevention Center handout
- Iowa Business Assistance pamphlet
- Iowa Waste Reduction Center pamphlet
- EPA, Office of Regulatory Enforcement, November 2004, Volume 7, Number 2, *Enforcement Alert*
- EPA, Office of the Administrator, *How to Make A Freedom of Information Act Request* pamphlet

I explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Crall. I also noted that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation and waste management practices, a review of waste management records, and a visual inspection. Mr. Crall acted as the official facility representative during the CEI and both Messrs. Crall and Datwyler accompanied me during the visual inspection.

I completed the CEI and summarized my findings and recommendations on June 21, 2007, with Messrs. Crall and Datwyler. Based upon these initial observations, a **Notice of Preliminary Findings (NOPF)** was issued to Relco during this CEI.

During the exit briefing, Mr. Crall acknowledged receipt of the following by his signature: a Confidentiality Notice (Attachment 3), which he signed indicating no CBI had been provided during the inspection, a Receipt for Documents and Samples (Attachment 4), and an NOPF (Attachment 5). Five (5) photographs were taken during the inspection and are included in Attachment 6.

FINDINGS AND OBSERVATIONS

Facility Operations

Mr. Crall confirmed that Relco began operation at its current location in Albia, Iowa in August 2005 (Attachment 6, Photograph 1). Relco is comprised of four buildings with approximately 120,000 square feet under roof. Relco employs 68 full-time personnel that work one of two, eight- or ten-hour shifts Monday through Friday. Relco's North American Industrial Classification System (NAICS) code is 48821.

Relco's business activities include locomotive wreck repair, locomotive rebuild and repair, and custom locomotive manufacturing. During the locomotive wreck repair process, locomotives are pre-inspected for initial damage assessment. The locomotive repair process starts by stripping and removing damaged parts, both mechanical and structural. Lubricating oils and fuels are removed from compromised locomotive systems before transport to Relco. However, intact systems are transported with the lubricating oils in place (fuel is always drained before

transport), and Relco drains all remaining fluids before mechanical repair. Next, mechanical parts are replaced with pre-manufactured replacement parts received from off-site vendors. Repaired mechanical systems are filled with new lubricating fluids as necessary.

Replacement structural parts are fabricated on-site using various dimensioned steel or are repaired with Bondo Filler Putty. Fabrication includes cutting steel to specification using plasma, sheer, or acetylene cutters. Fabricated parts are welded together and prepared for painting. Smaller damaged areas are repaired using body filler putty. The pre-mixed putty is used directly from the container and waste putty is not generated. The wreck-repaired locomotive is moved to the paint/sandblasting booth for paint preparation.

Locomotives are sandblasted with a high-power pressure washer that uses water and an abrasive (sand) to remove old paint and scale. The water and debris from sandblasting collects in a floor drain, which is pumped to a centrifuge that separates the water and debris particles. The water is routed to the sanitary sewer for treatment in the POTW. The remaining sludge is collected in a 55-gallon satellite accumulation container and managed as hazardous waste.

Relco uses a pro-mix (this process mixes paint during use so waste is minimized) solvent-based paint system for locomotive painting. A small fraction of the locomotives are not painted and transported to the customer for finishing. The remaining locomotives are painted to customer specification. Solvent and waste paint are collected and managed as hazardous waste.

Locomotive repair and rebuild focuses on the mechanical locomotive systems. The major mechanical systems are manufactured off-site and received at Relco per repair job specification. Structural repair is carried out using the same process as for repair of a wrecked locomotive. Additionally, custom locomotive manufacturing also follows the same process; however, the entire locomotive is built to specification.

Facility Status

The RCRA Handler Information Report (Attachment 7) indicates that Relco is registered with EPA as a small quantity generator of D001 characteristic hazardous waste, and a used oil generator. Through my review of current operations, interviews, and a review of Relco's disposal records, I determined that Relco is currently operating as a SQG of hazardous waste (D001, F003, and F005), a used oil generator, and a used oil marketer (without notifying EPA of used oil marketing activities). The Relco facility has not been in operation long enough to generate universal waste lamps, however, bulb replacement will begin soon, and I provided Messrs. Datwyler and Crall with technical assistance for universal waste management.

Facility Waste Streams

Below is a Waste Stream and Waste Handling Table for Relco. The table describes the major waste streams generated on-site, waste management practices, and off-site treatment, storage, and disposal. A brief description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 8). A facility layout indicating the hazardous waste management areas is included as Attachment 9.

Waste Stream and Waste Handling Table Relco Locomotive – Albia, Iowa					
Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Waste Paint Related Materials (Paint/Solvent)	Generated from painting and equipment cleanup activities	Hazardous waste D001, F003, F005	Approximately 30 gallons per month	Collected in 55-gallon satellite accumulation containers	Pollution Control Industries E. Chicago, IN 46312 Ultimate disposition: Fuel Blending
2) Waste Paint Solids	Generated from process wastewater pretreatment and paint solids	Hazardous waste D001, F003, F005	Approximately 30 gallons per month	Collected in 55-gallon satellite accumulation containers	Pollution Control Industries Ultimate disposition: Fuel Blending
NOPF 1 & 4; See Visual Inspection Section for associated violations including failure to keep satellite accumulation container closed, and failure to mark date of accumulation on hazardous waste containers in storage.					
3) Used Oil	Generated from facility and equipment maintenance	Used oil per definition in 40 CFR 279	Approximately 500 gallons per month	Collected in containers at POG and pumped into 2,500-gallon AST	Valley Environmental Services Newton, IA Ultimate disposition: Incineration
NOPF 5; See Visual Inspection Section for associated violation including failure to obtain an EPA ID# as a used oil marketer. (Rescinded as Relco operates under EPA ID # IAR000506105).					
4) Scrap Metal	Generated from fabrication of locomotive parts	Scrap metal per exemption in 40 CFR 261	Approximately 4 tons per month	Collected in roll-off containers	M. Shrago Oskaloosa, IA Ultimate disposition: Recycling

Waste Stream and Waste Handling Table Relco Locomotive – Albia, Iowa					
Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
5) Spent Parts Washer Solvent	Generated from spent parts washing fluid	Non-hazardous through analysis (MSDS located in Attachment 10)	Approximately 55 gallons per year	Mixed with the used oil and sent for incineration	Valley Environmental Services Newton, IA Ultimate disposition: Incineration
6) General Trash	Generated from non-production activities and general operation	Non-hazardous through process knowledge	Varies	Collected throughout the facility in trash bins	Unknown Ultimate disposition: Landfilled

Visual Inspection

The facility activities described in the Facility Operations section of this report generate the solid and hazardous wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation, accumulation, and storage areas associated with these wastes were visually inspected.

The visual inspection began with the fabrication and mechanical repair portion of the facility. I observed the breakdown of mechanical and structural parts from wrecked and rebuilt locomotives. The used oil generated from this process is collected in a small used oil tank which is then vacuum pumped to a 2,500 gallon aboveground used oil storage tank (Attachment 6, Photograph 2). I observed the used oil tank to be structurally sound, compatible with their contents, and labeled as "Used Oil." I did not observe any RCRA issues in the production area or used oil management area.

Next, I inspected the wastewater pretreatment area where I observed the centrifuge separation system. Wastewater is initially treated by separating the solids (paint chips, oil, and other debris from sandblast cleaning) from the wastewater. The solids are collected in a 55-gallon container at the centrifuge solid discharge point. Relco operates the centrifuge approximately twice per week. At the time of the inspection, (Thursday, June 21, 2007), I observed the 55-gallon satellite accumulation container to be open (Attachment 6 Photograph 3). The centrifuge was last used on Monday, June 18, 2007, and therefore, I discussed with Messrs. Datwyler and Crall the satellite accumulation requirement of keeping containers closed except when adding or removing waste. At that time, Mr. Crall attached the ring-lock container lid, thereby closing the container (Attachment 6, Photograph 4).

NOPF #1: Failure to keep satellite accumulation containers closed except when adding or removing waste, [40 CFR §262.34(c)(1)(i)].

Adjacent to the centrifuge collection system is a <180-day storage area. During discussion of the <180-day storage area's management, I observed that Relco did not have emergency information posted. Specifically, they did not have the phone number of the emergency coordinator or the fire department posted. Nor did Relco have the location of the fire extinguishers or spill equipment posted. I discussed the requirement to have the as noted above emergency information posted.

NOPF #2: Failure to post emergency information by a phone in the <180-day storage area, [40 CFR §262.34(d)(5)(ii)(A-C)].

Relco also manages ignitable waste in the <180-day storage area. I did not observe that "No Smoking" signs were posted where ignitable wastes are managed. I discussed with Messrs. Datwyler and Crall, the requirement to post "No Smoking" signs where ignitable or reactive wastes are managed.

NOPF #3: Failure to post "No Smoking" signs where ignitable or reactive wastes are managed, [40 CFR §265.17(a)]. (Upon further post-inspection review of the regulatory requirements for a SQG, Relco is not subject to this citation.

Finally, I observed the accumulation of one, 55-gallon container of waste paint solids. The container appeared to be structurally sound, compatible with its contents, and closed. However, the container was not marked with the first date of accumulation (Attachment 6, Photograph 5). I discussed with Messrs. Datwyler and Crall the requirement to mark the beginning date of accumulation on containers of hazardous waste in storage.

NOPF #4: Failure to mark beginning date of accumulation on containers in storage, [40 CFR §262.34(a)(2)].

The visual inspection concluded in the painting department. I observed the paint booth, paint mixing room, and the sandblast wash bay. At the time of the inspection, I observed the generation and collection of waste paint related materials in a 55-gallon satellite accumulation container in the paint mixing room. The container appeared to be structurally sound, compatible with its contents, and labeled with the identifying contents. Facility personnel were adding waste during the visual inspection, and they were observed closing the container after adding paint waste. Therefore, I did not observe any RCRA issues with the satellite accumulation of waste paint. The wash bay floor drains sandblast waste and water to the centrifuge and wastewater pretreatment system. I did not observe any RCRA issues in the sandblast wash bay area.

Records

On June 21, 2007, I reviewed the following facility records:

- 5 of 5 Hazardous Waste Manifests generated in the past 2 years were reviewed (2006-2007 manifests) (Example manifests, Attachment 11),
- Hazardous waste determination profiles (Attachment 12),
- Used Oil Bill of Ladings (past 2 years).

Upon reviewing the used oil bill of ladings, I further discussed the used oil management with Messrs. Datwyler and Crall. Accordingly, they indicated the used oil and spent parts washer solvent mix is burned by Valley Environmental Services (VES). I confirmed this information with Mr. Dean Broderson, Sales Technician with VES. VES is registered as used oil burner and transporter with the EPA, ID # IAR000506550 and EPA ID # 07060500701INP respectively. I inquired whether Relco had registered with EPA as a used oil marketer since their used oil is shipped off-site for burning for energy recovery. According to Mr. Crall, Relco was not registered with EPA as a used oil marketer. I discussed the requirements with Messrs. Datwyler and Crall.

NOPF #5: Failure to register and obtain and EPA ID # as a used oil marketer, [40 CFR §279.73(a)]. Upon further post-inspection review by EPA, this NOPF is not applicable and is therefore rescinded.

During the records review, I inquired of Messrs. Datwyler and Crall if Relco was required to have city, state or federal permits. Mr. Crall supplied me with the following for review:

- Title V Air Permit cover page identifying permit # 05-A-932.

SUMMARY

During the Relco CEI, I discovered through interviews, records review, and a visual inspection, that the facility is currently operating as a SQG of D001, F003, and F005 hazardous waste, a used oil generator and marketer. **An NOPF was issued to Relco at the conclusion of the inspection.** Before exiting the facility, I provided Mr. Crall the EPA Task Order Contract Officer Representative's contact information letter. I encouraged Relco to provide EPA with a written response outlining the planned and/or completed corrective measures addressing the NOPF.

Cathy S. Dolan
Cathy S. Dolan

Date: 8/16/07

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copy of Facility Representative(s) Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of the EPA Receipt for Documents and Samples (1 page)
- 5: Notice of Preliminary Findings (NOPF)(1 page)
- 6: Photographic Documentation (4 pages)
- 7: Copy of EPA RCRIS Handlers Information Report (1 page)
- 8: CEI Worksheets and Checklist (14 pages)
- 9: Copy of Facility Layout (1 page)
- 10: MSDS and Spent Solvent Analytical (4 pages)
- 11: Hazardous Waste Manifests (12 pages)
- 12: Hazardous Waste Analytical Profiles (4 pages)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Reko Locomotive Inspector: Cathys Dolan
Facility Ownership: SAME Primary Media: RCRA
Street: 1 REICO WAY Inspector Phone Ext.: 816-448-3252
City: Albia State: IA Zip: 52531 Date: 6/21/07
Phone: 641-932-3030 Facility Contact: DAVE CRAIG SIC/NAICS Code: 48821
Number of Employees: 68 Work Hours/Shifts: 2-8-12 hr shifts Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: repair of Locomotive engines + body

(Check all that apply): painting/coating (water-based ☐, solvent-based ☒) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,
water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,
non-halogenated-based ☒ , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other _____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☒ **Forward to EPCRA**
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**
3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**
a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☒
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☒
If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☒ **Forward to CWA**
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ **Forward to CWA**
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (**Get Photo**) **Forward to CWA**
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (**Get Photo**) **FWD to Wetlands**

Attachment 1 Page 1 of 2

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ **Forward to UIC**
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ **Forward to PWS**
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ **Forward to CAA**
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☒
If yes, is equipment permitted? Yes ☒ No ☐ **Forward to CAA** Describe: _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ **Forward to CFC**
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ **Forward to EPCRA/RMP**
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ **Forward to CFC**

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☒
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☒ (stop) No ☐ **Forward to RCRA**
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ **Forward to RCRA**
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

Material Claimed To Be Non-Hazardous**How does the facility know these wastes are non-hazardous?**

- _____ Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- _____ Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- _____ Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- _____ Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- _____ Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ **Forward to RCRA**
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ **Forward to RCRA & EPCRA** Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ **Forward to UST**
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ **Forward to UST**

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☐ (stop) Yes ☒ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ **Forward to SPCC**
If yes, are there secondary containment systems for the tanks? Yes ☒ No ☐ **Forward to SPCC**
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) **Forward to SPCC**

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

Attachment 1 Page 2 of 2*** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**

Attachment 1

Region 7 Multimedia Screening Checklist

Attachment 2

Copy of Facility Representative(s) Business Card



(641) 932-3030
(800) 435-6091
Fax (641) 932-3375
E-mail: dcrall@relcolocomotives.com

Dave Crall
Director of Engineering

One Relco Way
Albia, IA 52531
www.relcolocomotives.com

Attachment 3

Copy of the EPA Confidentiality Notice

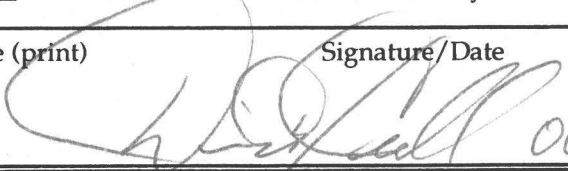
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name BELCO LOCOMOTIVE	
Facility Address 1 BELCO WAY, ALBIA IA 52531	
Inspector (print) Cathy S. Dolan	
Date 6/21/07	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 BOOZ ALLEN HAMILTON	Date

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) DAVID M. CRALL	Signature/Date  06/21/07

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

Attachment 4

Copy of the EPA Receipt for Documents and Samples

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name RELCO LOCOMOTIVE
Facility Address 1 RELCO WAY, ALBIA IA 52531

Documents Collected? YES___ (list below) NO___

Samples Collected? YES___ (list below) NO___ Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge___ 2)Borrowed___ 3)Purchased___

Amount Paid: \$___ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) Facility Layout (1 pg)
- 2) HAZARDOUS WASTE manifests w/LDR (12 pg)
- 3) WASTE Profiles (4 pg)
- 4) PARTS WASHER solvent MSDS (2 pg)

CSO

Facility Representative (print) DAVID M. CRALL	Signature/Date <i>[Signature]</i> 06/21/07
Inspector (print) Cathy S Dolan	Signature/Date <i>[Signature]</i> 6/21/07
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101 BODZ ALLEN HAMILTON	

(rev: 1/20/93)

Attachment 5

Notice of Preliminary Findings

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: KECO LOCOMOTIVE
ADDRESS: KECO WAY
ALBIA TA 52531
EPA ID NUMBER: TAR000506105 DATE: 6/21/07

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

- 1.) 40 CFR 262.34 (c)(1) > 265.123(a) Failure to keep containers of hazardous waste closed except when adding or removing waste
- 2.) 40 CFR 262.34 (c)(A-C) Failure to post the name, telephone, emergency coordinator, location of fire extinguishers & spill control equipment, + telephone # to the Fire Department
- 3.) 40 CFR 265.17(a) Failure to post no smoking signs by
- 4.) 40 CFR 262.34(a)(2) Failure to mark date of accumulation
- 5.) 40 CFR 265.17(a) Failure to use a manifest system for
- 6.) 40 CFR 265.17(a) Failure to use a manifest system for
- 7.) 40 CFR 279.73 (a) Failure to obtain an EPA ID # for a used oil

If you have any questions regarding these findings please
contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: DAVID M. CRALL TITLE: DIRECTOR OF ENGINEERING

SIGNATURE: [Signature] 06/21/07

This document was prepared by Cathy S Dolan

Page 1 of 1

Attachment 6

Photographic Documentation

PHOTO LOG

Facility Name / City: RELCO LOCOMOTIVE

1 Relco Way

Albia, IA 52531

Facility ID #: IAR000506105

Date: June 21, 2007

Photographer: Cathy Dolan

Type of Camera: Sony Digital Still Camera, DCS-P72, Serial #1398911

Digital Recording Media: Memory Stick

All digital photos were copied by: Sona Holder on 06/27/2007.

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by Sona Holder.

No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Cathy Dolan	06/21/2007	0840	013	Facing North, Relco Locomotive building façade.
2	Cathy Dolan	06/21/2007	1023	014	Aboveground used oil tank marked as "Used Oil."
3	Cathy Dolan	06/21/2007	1027	015	Satellite accumulation container of sandblast and wash pit bay sludge collection, container is open, but marked with the identifying contents.
4	Cathy Dolan	06/21/2007	1028	016	Satellite accumulation container after being closed at the time of the inspection.
5	Cathy Dolan	06/21/2007	1029	017	Container in storage not marked with the date of accumulation.

Relco Locomotive
Albia, Iowa

Photo Number: 1
Photographer: Cathy Dolan
Direction: North
Date: 06/21/2007
Time: 0840
Description: Relco Locomotive
building façade.



Photo Number: 2
Photographer: Cathy Dolan
Direction: N/A
Date: 06/21/2007
Time: 1023
Description: Aboveground used oil
tank marked as "Used
Oil."



Relco Locomotive
Albia, Iowa

Photo Number: 3
Photographer: Cathy Dolan
Direction: N/A
Date: 06/21/2007
Time: 1027
Description: Satellite accumulation container of sandblast and wash pit bay sludge collection, container is open, but marked with the identifying contents.



Photo Number: 4
Photographer: Cathy Dolan
Direction: N/A
Date: 06/21/2007
Time: 1028
Description: Satellite accumulation container after being closed at the time of the inspection.



Attachment 6 Page 3 of 4

Relco Locomotive
Albia, Iowa

Photo Number: 5
Photographer: Cathy Dolan
Direction: N/A
Date: 06/21/2007
Time: 1029
Description: Container in storage
not marked with the
date of accumulation.



END OF PHOTOGRAPHIC DOCUMENTATION

Attachment 6 Page 4 of 4

Attachment 7

Copy of EPA RCRIS Handlers Information Report

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Lisa Haugen, ARTD/RESP.

EPA RCRA ID Number: IAR000506105

Name of Company/Site: RELCO LOCOMOTIVE
Location of Site: 1 RELCO WAY
ALBIA, IA 52531
MONROE County

Land Type: Private

NAICS: 48821 - Support Activities for Rail Transportation

Mailing Address: 1 RELCO WAY
ALBIA, IA 52531

Site Contact: ~~KURT DETWILLER~~ DAVE CRALL
Phone Number: (641) 932-3030
Address: 1 RELCO WAY
ALBIA, IA 52531

Current Owner of Site: RELCO LAND HOLDINGS OF IOWA
Owner Type: Private

Current Operator of Site: RELCO LOCOMOTIVE
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator, USED OIL MARKETER

Hazardous Wastes Handled: D001 UOIL FOO3, F005

I 06/21/06 2 N 03/22/06 2

Certified by State/EPA

on 06/21/06 by
JIM L LYNCH 06/21/06
NOWCC/SEE INVESTIGATOR

Attachment 7 Page 1 of 1Date of Site Visit: 6/21/07Name of Inspector (Please print): CATHY S Dolan(Check one): ☐ EPA R7 ENSV ☒ EPA R7 Contractor ☐ NOWCC/SEE InvestigatorSignature of Inspector: Cathy S Dolan

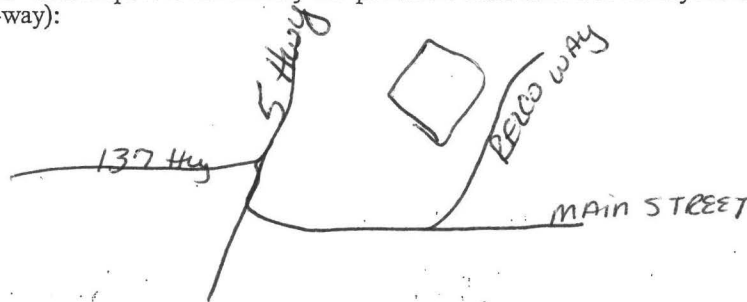
Attachment 8

CEI Worksheets and Checklist

Appendix 1-3

Facility: RELCO LOCOMOTIVE Date: 6/21/07 Arrival time: 8:35DRIVE-BY1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- Containers
- Unloading Areas
- Unusual Staining
- Safety Concerns

- Tanks
- Security Devices
- Unusual Odors
- Other Concerns

- Processing Equipment
- Open Drums
- Obvious Discharges

- Loading Areas
- Stressed Vegetation
- Improper Disposal

Appendix 1-4

SITE ENTRY AND INBRIEFING1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☐ No

2. Facility Representative(s): KURT Detwiler Title: Production Supervisor 2 yrs
DAVE CRALL Title: DIRECTOR OF ENGINEERING
 Title: _____

3. Does representative have intimate knowledge of all waste management practices? Yes ☐ No

How long in position? _____

4. Introduction:

- ☒ Presented credentials
☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
☒ Verified presence at correct facility (checked address/I.D. #)
☒ Explained authority to conduct inspection (Section 3007 of RCRA)
☒ Identified personal safety considerations: _____
☒ Explained the purpose, scope, and order of the inspection
☒ Completed Multimedia screening checklist
☒ Explained documentation process - worksheets, checklists, photo's, notes, statements, etc
☒ Provided SBRFA
☐ Obtained GPS reading
☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☐ By facility representative or. Other(name): _____
☐ No - Access denied Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

Appendix 1-5

FACILITY BACKGROUND WORKSHEET

1. Site history:

Date facility began operating: Aug 2005 Number of employees: 68
Number of shifts/hours worked: 2 shift 8-10 shifts Number of days worked per week: 5
Size (sq. ft., how divided): 4 buildings w/ approx 120,000

Property owner and facility operator the same? ☒ YES ☐ NO

2. Major products or services provided: 13. Major raw materials used: paint, solvents, metals

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/ProcessWaste Stream(s)SEE WASTE STREAM TABLE in Report

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ YES ☐ NO

7. **GENERATOR STATUS:** (based on records review)

- ☐ Non-generator
☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)
☒ SQG (100-1000kg/mo and accumulate <6000 kg)
☐ LQG (>1000kg/mo)

Is facility's status solidly within above category? ☒ YES ☐ NO
 (If not carefully verify status and document)

8. **TSD STATUS:**

☐ Treatment ☐ Storage ☐ Disposal

Note: Types of units, number of units, capacities, processes, etc.

9. Resolved questions from Pre-Inspection Worksheet? ☐ YES ☐ NO ☐ No Questions

10. Resolved compliance officers questions from Pre-Inspection Worksheet? ☐ YES ☐ NO ☐ No Questions

11. Requested site map or diagram to identify all observations? ☐ YES ☐ None available

#	WASTE STREAM NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MGMT./DISPOSAL
1	WASTE PAINT RELATED MATERIALS (paint/solvent)	Painting + equipment cleaning activities	D001, F003 F005	55-gal ~ 2 months	Collected in Sat Accum Containers	Pollution Control INDUSTRIES E. Chicago IN Fuel Blending

Violations -

2	WASTE PAINT SOLIDS	WATER pre-treat- ment + paint solids	D001, F003 F005	55-gal ~ 2 months	Collected in Sat Accum containers	Pollution Control INDUSTRIES E. Chicago IN Fuel Blending
---	-----------------------	--------------------------------------------	--------------------	----------------------	--------------------------------------	-----------------------------------------------------------------------

Violations - 1+4, Failure to keep containers of HAZARDOUS WASTE CLOSED, 40 CFR 262.34(c)(1) +
Failure to mark date of accumulation on containers in storage, 40 CFR 262.34
(a)(2)

3	USED OIL	Facility, Equip, + mfg processes	USED oil per 279	500-gal per month	Collected in 2500 gallon AST	VALLEY Environ- mental Services Newton MA Fuel Blended
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Violations - 5, Failure to obtain an EPA ID# for a fuel marketer, 40 CFR
279.73 (a)

#	WASTE STREAM NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MGMT./DISPOSAL
4	Scrap metal	Fabrication of locomotive parts	Exempt	4 tons per month	collected in roll of containers	Shrago ASKA/005A, IA Recycled

Violations -

5	SPENT PARTS WASHER Solvent	Spent parts washing fluid	non-hazardous through analysis	55 gal ~ year	mixed w/ used oil + sent for incineration	UAuey Environ-mental Services Full Blended
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Violations -

--	--	--	--	--	--	--

Violations -

Appendix 1-8

RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	✓/x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)	
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	N/A	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique five digit document number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol. -262.20(a)	
11.	✓	Proper certification (highway, rail, water or air) including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	✓	Exception report submitted if necessary-262.42	
14.	N/A	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.	N/A	Generator maintains copy of contractual agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1st shipment -268.7(a)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7	
18.	✓	LDR notification/certification/ waste analysis data & other documents maintained for 3 years-268.7.(a)(8)	
19.	N/A	Biennial Reports submitted per 262.41 (LQG only)	

✓-in compliance X-not in compliance N/A-not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years 8

21. Approximate number of manifests reviewed: 8

22. Copies of manifests made with regulatory violations? ☐ YES ☒ NO

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: ON-SITE
2. Person responsible for waste analysis/waste determination: DAVE BRALL

#	✓ /x	REGULATORY REQUIREMENTS	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal- 262.11(d)-268.7(a).	
5.	✓	Determines waste does not meet applicable treatment standards (ATS) - 268.7(a)(2).	
a.	✓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file - 268.7(a)(2)	
b.	NA	SQG disposes of waste under a contractual or tolling agreement - 268.7(a)((10). (LDR Notice available for the initial shipment and Copy of LDR Notice kept for 3 years after termination of agreement).	
6.	NA	Waste covered by a National Capacity Variance(s)- 268 Subpart C, Extension, or Petition - 268.5 & 6. (Describe the variance, extension, or petition that applies):	
a.	✓	Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs - 268.7(a)(4).	
7.	✓	Ships waste(s) covered by the LDRs off-site for treatment or disposal - 268.7(a)(1) If no, go to 8.	
a.	✓	Provides a notice with initial shipment, or new notification, if changes occur - 268.7(a)(1)	
b.	✓	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable.	
8.	NA	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation - 268.7(a)(7).	
a.	✓	Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files - 268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice) - 268.7(a)(2)(i)	
9.	✓	Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment - 268.7(a)(3).	
a.	✓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file - 268.7(a)(3)(i)	
10.	✓	Additional special rules regarding waste that exhibits a characteristic - 268.9.	

a.	<input checked="" type="checkbox"/>	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i) - 268.9(a)
b.	<input checked="" type="checkbox"/>	If land disposed, waste meets the treatment standards specified in 278 Subpart C - 268.9(c)
c.	<input checked="" type="checkbox"/>	First claims that their characteristic waste is no longer hazardous - sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility - 268.9 (d)
11.	<input checked="" type="checkbox"/>	Impermissible dilution of waste to meet LDR standards is not occurring - 268.11(d) - 268.3(a) & (b)
12.	<input checked="" type="checkbox"/>	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge - See additional LDR checklists in Appendix 2-1.
13.	<input checked="" type="checkbox"/>	References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes - 268.30 - Dioxin-containing Wastes - 268.31 - TC Metal Wastes - 268.34 - Petroleum Refining Wastes - 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated - 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes - 268.38 - Spent Aluminum Pot liners; Reactive; and Carbamate Wastes - 268.39
14.	<input checked="" type="checkbox"/>	Prohibition on Storage of Restricted Waste - 268.50
15.	<input checked="" type="checkbox"/>	Reminder - Treatment Standards listed in 268.41 through 268.49

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit standards

16. Notes/Observations: _____

J. USED OIL - RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? marketing + generation
- a. Type of used oil generated? hydraulic
- b. Amount of used oil generated? 500 gal ~ month

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265?
☐ Yes ☒ No ☐ Not Applicable (NA)
2. Is used oil being used as a dust suppressant? ☐ Yes ☒ No
3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (C)(1-3)? ☒ Yes ☐ No

Subpart C - Standards for Used Oil Generators(Check here ☐ if this section is NA)

Instructions: Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.

Regulation and Standard	Violations
279.21 Hazardous Waste Mixing 1. Is the generator mixing hazardous waste with used oil? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA 2. Are analytical data available? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
279.22 Used Oil Storage 1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA 2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA 3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA 4. Upon detection of a release of used oil, has the generator a. Stopped the release? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA b. Contained the release? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA c. Cleaned up and managed the used oil and other materials? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
279.23 On-Site Burning in Space Heaters 1. Is the generator burning used oil in used oil fired space heaters only when a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA c. The combustion gases from the heater are vented to ambient air? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	

Regulation and Standard	Violations
<p>279.24 Off-Site Shipment</p> <p>1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained an U.S. Environmental Protection Agency (EPA) identification (ID) number?</p> <p>2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?</p> <p><i>If yes, answer the three following questions. If no, move to question 6.</i></p> <p>3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?</p> <p>4. Does the tolling contract indicate the type of used oil and the frequency of shipment?</p> <p>5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?</p> <p>6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p>
Regulation and Standard	Violations
<p>7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?</p> <p>8. Does the generator transport no more than 55 gallons of used oil at any time?</p> <p>9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

For further Used Oil questions refer to Appendix 2-4:

Subpart D - Standards for Used Oil Collection Centers and Aggregation Points

Subpart E - Standards for Used Oil Transporters and Transfer Centers

Subpart F - Standards for Used Oil Processors and Re-Refiners

Subpart G - Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery

Subpart H - Standards for Used Oil Fuel Marketers

Appendix 1-9

VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☐ < 90 day ☒ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S./Permitted capacity: _____

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	X	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34-265.171	
6.	✓	Containers are compatible with waste-262.34-265.172	
7.	✓	Containers kept closed-262.34-265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	NA	Storage area inspected weekly-265.174	
ADDITIONAL I.S. REQUIREMENTS*			
14.	NA	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading/unloading areas (when in use)-265.15(a)(4)	
PRE-TRANSPORT REQUIREMENTS*			
20.	✓	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable *- please note applicable permit requirement

27. Container inventory: ☐ Actual count ☐ Approximate count

Waste Type	Container Size	Total
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____
_____	_____ x 55 gal. _____ x 30 gal.	_____

Total Quantity (pounds, gallons, etc.): _____

28. How were container volumes verified? _____

29. Photos taken to verify observations: ☐ YES ☐ NO Numbers: _____

30. Container management area location noted on map or diagram: ☐ YES ☐ NO

31. Notes Observations: _____

B. SATELLITE ACCUMULATION AREA(S)1. Total number of satellite areas inspected at facility: 2

#	REGULATORY REQUIREMENTS	SA1: <u>Centrifuge</u>	SA2: <u>Paint Booth</u>	SA3: _____	SA4: _____
2.	Area at or near the point of generation-262.34(c)(1)	✓	✓		
3.	Area under the direct control of operator-262.34(c)(1)	✓	✓		
4.	Quantities accumulated do not exceed 55-gallons or 1 quart (acute) -262.34(c)(1)	✓	✓		
5.	Excess accumulation removed within 3 days-262.34(c)(2)	✓	✓		
6.	Containers marked identifying their contents-262.34(c)(1)	✓	✓		
7.	Containers in good condition-262.34(c)(1)	✓	✓		
8.	Containers are compatible with waste-262.34(c)(1)	✓	✓		
9.	Containers kept closed-262.34(c)(1)	X	✓		

✓-in compliance X-not in compliance N/A-not applicable

Above Satellite Areas with problems:

SA1: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volume of waste accumulated: _____

Number and Type of containers: _____

SA2: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volume of waste accumulated: _____

Number and Type of containers: _____

SA3: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volume of waste accumulated: _____

Number and Type of containers: _____

SA4: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volume of waste accumulated: _____

Number and Type of containers: _____

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☐ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
 - Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
 - Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity
- ☒ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives
- NOV issued? ☒ Yes ☐ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations
- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form
3. Specific information requested from facility? ☐ Yes ☒ No
4. Facility appears to have awareness of RCRA regulations ☒ Yes ☐ No
5. Facility has its own environmental staff? ☒ Yes ☐ No
6. Facility has copy of applicable regulations? ☒ Yes ☐ No
7. Attitude and demeanor of facility representative(s): ☒ OK ☐ Not OK
8. Notes/Observations:

Attachment 9

Copy of Facility Layout

Attachment 10

MSDS and Spent Solvent Analytical

MATERIAL SAFETY DATA SHEET

Date Issued: 01/01/05

SECTION A - IDENTIFICATION & EMERGENCY INFORMATION

Manufacturer's Name: **BP Lubricants USA Inc.**
Emergency Telephone Number: 410-574-5000
800-777-1466

Address: 9300 Pulaski Highway
Baltimore, MD 21220

PRODUCT NAME: Castrol Solvent
Chemical Name: Petroleum Solvent

PART NUMBER: 8122

CAS Number: See Section B

Product Appearance & Odor: Clear Water-White Liquid
Mild Mineral Spirits Odor

HAZARDOUS MATERIALS IDENTIFICATION SYSTEM (HMIS)

Health - 0 Flammability - 2 Reactivity - 0

Hazard Rating: Least - 0, Slight - 1, Moderate - 2, High - 3, Extreme - 4

SECTION B - COMPONENTS & HAZARD INFORMATION

<u>COMPONENTS</u>	<u>CAS NO. OF COMPONENTS</u>	<u>APPROXIMATE CONCENTRATION</u>
Aliphatic Petroleum Distillates	64742-88-7	100%
Proprietary Additives	Mixture: COMPLEX MIXTURE CAS Number Not Applicable	Not Applicable

Exposure Limit for Total Product: 100 ppm (525 mg/m³) for an 8 hour work day.

US TSCA Inventory: All components of this material are on the US TSCA Inventory

Reportable Quantity EPA Regulation 40 CFR 302 (CERCLA Section 102): No RQ for product for any component greater than 1% or 0.1% (Carcinogen).

Threshold Planning Quantity (TPQ) EPA Regulation 40 CFR 355 (SARA Sections 301-304): No TPQ for product for any component greater than 1% or 0.1% (Carcinogen).

Toxic Chemical Release Reporting, EPA Regulation 40 CFR 372 (SARA Section 313): Not Application.

EPA Hazard Classification Code:

☐ -Acute Hazard ☒ -Chronic Hazard ☒ -Fire Hazard ☐ -Pressure Hazard ☐ -Reactive Hazard

DEPARTMENT OF TRANSPORTATION (DOT) - DOT IDENTIFICATION NUMBER: Transported by highway or rail: Bulk packagings (capacity greater than 119 gallons) : Petroleum Distillate, n.o.s., Combustible Liquid, N1268, III. Non-bulk packaging (capacity <119 gallons) Not regulated. Transported by air or marine vessel: Bulk or non-bulk packaging; Petroleum Distillate, n.o.s., 3, UN1268,III.

SECTION C - PHYSICAL DATA (THE FOLLOWING DATA ARE APPROXIMATE OR TYPICAL VALUES.)

Boiling Range: 187° -206°C
Specific Gravity (H₂O=1): 0.79
Pour Point: N/A°
Viscosity: N/A°
pH: N/A

Percent Volatile by Volume: 100%
Vapor Pressure: @20°C(68°F) mmHg 0.4
Vapor Density: 5.3(Air=1)
Evaporation Rate: (N-Butyl Acetate=1):0.03
Solubility in Water: Negligible

SECTION D - FIRE PROTECTION INFORMATION

FLASH POINT & METHOD: 62°C(143°F)

Method~ASTM D 56, TCC

AUTO IGNITION TEMPERATURE: Not Determined

HANDLING PRECAUTIONS: Keep away from ignition sources, such as heat, sparks, pilot lights, and open flames.

NATIONAL FIRE PROTECTION ASSOCIATION

(NFPA)-Hazard Identification

Health - 0

Flammability - 2

Reactivity - 0

Basis: Recommended by BP Lubricants USA Inc.

Hazard Rating (NFPA):

4 - Extreme, 3 - High, 2 - Moderate,

1 - Slight, 0 - Insignificant

UNUSUAL FIRE & EXPLOSION HAZARDS:

Combustible

Flammability Limits (% by volume in air):

Lower: 1.0% Upper: 7.0%

SECTION D - FIRE PROTECTION INFORMATION (CONTINUED) EXTINGUISHING MEDIA AND FIRE FIGHTING PROCEDURES:

Foam, water spray (fog), dry chemical, carbon dioxide and vaporizing liquid type extinguishing agents may all be suitable for extinguishing fires involving this type of product, depending on size or potential size of fire and circumstances related to the situation. Plan fire protection and response strategy through consultation with local fire protection authorities or appropriate specialists. The following procedures for this type of product are based on the recommendations in the National Fire Protection Association's "Fire Protection Guide on Hazardous Materials," Tenth Edition (1991): Use dry chemical, foam or carbon dioxide to extinguish the fire. Water may be ineffective, but water should be used to keep fire-exposed containers cool. If a leak or spill has ignited, use water spray to disperse the vapors and to protect men attempting to stop a leak. Water spray may be used to flush spills away from exposures. Minimize breathing of gases, vapor, fumes or decomposition products. Use supplied-air breathing equipment for enclosed or confined spaces or as otherwise needed.

NOTE: The inclusion of the phrase "water may be ineffective" is to indicate that although water can be used to cool and protect exposed material, water may not extinguish the fire unless used under favorable conditions by experienced fire fighters trained in fighting all types of flammable liquid fires.

DECOMPOSITION PRODUCTS UNDER FIRE CONDITIONS:

Fumes, smoke, carbon monoxide, aldehydes and other decomposition products in the case of incomplete combustion. **"EMPTY" CONTAINER WARNING:** "Empty" containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION: THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to clean since residue is difficult to remove. "Empty" drums should be completely drained, properly bunged and promptly returned to a drum reconditioner. All other containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations. For work on tanks refer to Occupational Safety and Health Administration regulations, ANSI Z49.1, and other governmental and industrial references pertaining to cleaning, repairing, welding, or other contemplated operations.

SECTION E - PROTECTION & PRECAUTIONS

VENTILATION: Use only with ventilation sufficient to prevent exceeding recommended exposure limit or buildup of explosive concentrations of vapor in air. No smoking, or use of flame or other ignition sources.

RESPIRATORY PROTECTION: Use supplied-air respiratory protection in confined or enclosed spaces, if needed.

PROTECTIVE GLOVES: Use chemical-resistant gloves, if needed, to avoid prolonged or repeated skin contact.

OTHER PROTECTIVE EQUIPMENT: Use chemical-resistant apron or other impervious clothing, if needed, to avoid contaminating regular clothing, which could result in prolonged or repeated skin contact.

WORK PRACTICES/ENGINEERING CONTROLS: Keep containers closed when not in use. Do not store near heat, sparks, flame or strong oxidants. In order to prevent fire or explosion hazards, use appropriate equipment. Information on electrical equipment appropriate for use with this product may be found in the latest edition of the National Electrical Code (NFPA-70). This document is available from the National Fire Protection Association, Batterymarch Park, Quincy, Massachusetts 02269.

PERSONAL HYGIENE: Minimize breathing vapor or mist. Avoid prolonged or repeated contact with skin. Remove contaminated clothing; launder or dry-clean before re-use. Remove contaminated shoes and thoroughly clean and dry before re-use. Cleanse skin thoroughly after contact, before breaks and meals, and at end of work period. Waterless hand cleaners followed by washing thoroughly with soap and water readily remove product from skin.

VARIABILITY AMONG INDIVIDUALS: Health studies have shown that many petroleum hydrocarbons and synthetic lubricants pose potential human health risks, which may vary from person to person. As a precaution, exposure to liquids, vapors, mists or fumes should be minimized.

SECTION F - SPILL OR LEAK PROCEDURE

ENVIRONMENTAL IMPACT: Report spills as required to the appropriate authorities. U.S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to the Coast Guard toll free number 800-424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Shut off and eliminate all ignition sources. Keep people away. Recover free product. Add sand, earth or other suitable absorbent to spill area. Minimize breathing vapors. Minimize skin contact. Ventilate confined spaces. Open all windows and doors. Keep product out of sewers and watercourses by diking or impounding. Advise authorities if product has entered or may enter sewers, watercourses, or extensive land areas. Assure conformity with applicable governmental regulations. Continue to observe precautions for volatile, combustible vapors from absorbed material.

ASSURE CONFORMITY WITH ALL APPLICABLE REGULATIONS. WASTE DISPOSAL: Dispose of in an environmentally safe manner and in accordance with all government regulations to include Federal, State, and local requirements.

SECTION G - REACTIVITY

STABILITY: Stable

HAZARDOUS POLYMERIZATION: Will not occur.

CONDITIONS & MATERIALS TO AVOID: Avoid heat, open flames and oxidizing materials.

HAZARDOUS DECOMPOSITION PRODUCTS: Thermal decomposition products are highly dependent on the combustion conditions. A complex mixture of airborne solid, liquid, particulates and gases will evolve when this material undergoes combustion. Carbon monoxide and other unidentified organic compounds may be formed upon combustion.

SECTION H - EMERGENCY & FIRST AID PROCEDURES AND PRIMARY ROUTES OF ENTRY

EYE CONTACT: If splashed into the eyes, flush with clear water for 15 minutes or until irritation subsides. If irritation persists, call a physician.

SKIN CONTACT: In case of skin contact, remove any contaminated clothing and wash skin thoroughly with soap and water.

INGESTION: If ingested, DO NOT induce vomiting; call a physician immediately. **INHALATION:** If overcome by vapor remove from exposure and call a physician immediately. If breathing is irregular or has stopped; start resuscitation, and administer oxygen, if available.

SECTION I - EFFECTS OF OVEREXPOSURE (SIGNS AND SYMPTOMS OF EXPOSURE)

High vapor concentrations (attainable at elevated temperatures well above ambient) are irritating to the eyes and the respiratory tract, and may cause headaches, dizziness, anesthesia, drowsiness, unconsciousness, and other central nervous system effect, including death.

The precise composition of this mixture is proprietary information. A more complete disclosure will be provided to a physician or nurse in the event of a medical emergency.

Analytical Testing Services, Inc.

[ATS] An Independent Laboratory

190 Howard St
PO Box 61
Franklin, PA USA 16323-0061
(814) 432-7214
FAX: 814-432-9424
www.WeTestIT.com

October 18, 2006

Ken Reif
Valley Distribution
12041 130th St
Burlington, IA 52601-8809

Ken,

The analysis of the recent sample you submitted is as follows:

Lab ID	40417
Date Received	10-09-2006
Valley Distribution ID	Rilco-Albia Solvent
Viscosity @ 100°C, cSt	0.79
Water, %	<0.5
Chromium, ppm	0.0
Lead, ppm	0.2
Arsenic, ppm	0.0
Cadmium, ppm	0.0
API Gravity @ 60°F	48.4
Flash, PM, °C	68
Ash, %	0.01
Chlorine, ppm	15

Based on the above analysis and the parameters we discussed, the PCB content was not determined.

If you have any questions concerning this sample, please let us know.

Sincerely,



Richard M. Eakin, President

Reference: Final Report and Invoice #4114 Emailed on Oct-18-2006 to Ken Reif at
kenr@valleydistribution.com

Since services are based on sample and information supplied by others, these services are rendered without any warranty or liability.
Sample will be retained for thirty (30) days.

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The Heavy Duty
Green Book**Castrol Solvent****Typical Analysis**

Part Number	8122
Aniline Point (ASTM D 811)	165 max.
Kauri Butanol Value (ASTM D 1133)	29-45
Aromatic Hydrocarbons, %v (UV-DPMC Method)	0.5 max.
Flash Point, °C, (°F) (TCC) (ASTM D-56)	61 (143)
Vapor Pressure @20°C (68°F) mmHg	0.4
Distillation Range, °C (°F)	187-206 (368-402)
Gravity °API, (ASTM D 4052)	44.6-50.5

Protection and Precautions:**Respiratory Protection:**

Use supplied-air respiratory protection in confined or enclosed spaces, if needed.

Ventilation:

Use only with ventilation sufficient to prevent exceeding recommended exposure limit or buildup of explosive concentrations of vapor in air. Use explosion-proof equipment. No smoking or open lights.

Protective Gloves:

Use chemical resistant gloves, if needed, to avoid prolonged or repeated skin contact.

Work Practices/Engineering Controls:

Keep containers and storage containers closed when not in use. Do not store near heat, sparks, flame or strong oxidants. To prevent fire or explosion risk from static accumulation and discharge, effectively ground product transfer system in accordance with the National Fire Protection Association standard for petroleum products.

Eye Protection:

Use splash goggles or face shield when eye contact may occur.

Other Protective Equipment:

Use chemical resistant apron or other impervious clothing, if needed, to avoid contaminating regular clothing which could result in prolonged or repeated skin contact.

Personal Hygiene:

Minimize breathing vapor or mist. Avoid prolonged or repeated contact with skin. Remove contaminated clothing; launder or dry clean before reuse. Remove contaminated shoes and thoroughly clean and dry before reuse. Clean skin thoroughly after contact, before breaks and meals, and at end of work period. Product is readily removed from skin by waterless hand cleaners followed by washing thoroughly with soap and water. Call 1-800-777-1466 or visit the web site www.castrol.com/us to request a complete Material Safety Data Sheet.

Attachment 11

Hazardous Waste Manifests

HAZARDOUS WASTE MANIFEST		1. Generator ID Number 1 AR0000006105	2. Page 1 of 1	3. Emergency Response Phone 800-535-6053	4. Manifest Tracking Number 002183835 JJK		
Generator's Name and Mailing Address RELCO LOCOMOTIVE 1 RELCOWAY ALBIA IA 52531				Generator's Site Address (if different than mailing address) 			
Generator's Phone: 841 032-3521				U.S. EPA ID Number PAR0000504044			
6. Transporter 1 Company Name ALPONT TRANSPORTATION LLC				U.S. EPA ID Number 			
7. Transporter 2 Company Name 				U.S. EPA ID Number 			
8. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO IN 48312				U.S. EPA ID Number IND0000648043			
Facility's Phone: 219 397-3951							

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			D001	F003	F005
X	1. RQ Waste Paint Related Material (D001, F003, F005) 3, UN1263, II (ERG 128)	008	DM	440	G			
X	2. Waste Flammable solids, organic, n.o.s. (Toluene, Xylene) 4.1, UN1325, III (ERG 133)	004	DM	220	G			
	3.							
	4.							

14. Special Handling Instructions and Additional Information
9b1) STREAM# 293410 9b2) STREAM# 293423 PO#: VERBAL/KIRK

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name: **JOHN A. WIND** Signature: *[Signature]* Month: **05** Day: **21** Year: **07**

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: **Daniel K. Stechem** Signature: *[Signature]* Month: **05** Day: **21** Year: **07**
Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Signature: Month: Day: Year:

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location RELCO LOCOMOTIVE 1 RELCOWAY ALBIA, IA 52531

EPA ID Number IAR000506105 Manifest Number 002183835JJK

Waste Analysis Available Yes No X On file at facility

Date 05-21-07

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES List all applicable constituents from key below g	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039 List all applicable constituents from Table I and/or key below h
				Nonwastewater >1% TOC & >1% TSS e	Wastewater f		
a	b	c	d				
293410		D001, F003, F005		X			32, 26
293423		D001, F003, F005		X			32, 26

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB \geq 50 ppm 2) Halogenated Organic Carbon (HOC's) \geq 1000 mg/l 3) Nickel (Ni) \geq 134 mg/l 4) Thallium (TI) \geq 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|-------------------------------------------|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

Under penalty of law that the above information is accurate and true.

Jon R. Lund

Print Name

Jon R. Lund

WHITE - PCI

YELLOW - GENERATOR

Attachment 1 Page 2 of 2

8354785/502892

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 1AR000508105	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 000069428 JJK			
5. Generator's Name and Mailing Address RELCO LOCOMOTIVE 1 RELCOWAY ALBIA IA 52531		Generator's Site Address (if different than mailing address)						
Generator's Phone: 841 932-3821								
6. Transporter 1 Company Name ALPONT TRANSPORTATION LLC		U.S. EPA ID Number PAR000504944						
7. Transporter 2 Company Name		U.S. EPA ID Number						
8. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO IN 46312		U.S. EPA ID Number IND0000646043						
Facility's Phone: 219 397-3951								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	1. RQ, Waste Paint Related Material (D001, F003, F005) 3. UN1263, II (ERG 128)		008 DM		440	G	D001	F003 F005
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information STREAM# 293410 C# 29982								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Chuck Osborn			Signature Chuck Osborn			Month Day Year 11/15/06		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Daniel K. Shehorn			Signature Daniel K. Shehorn			Month Day Year 11/27/06		
Transporter 2 Printed/Typed Name			Signature			Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:								
18b. Alternate Facility (or Generator) U.S. EPA ID Number								
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. He161 2. 3. 4.								
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name Vanne Hoffman			Signature Vanne Hoffman			Month Day Year 11/27/06		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000508105	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 000069428 JJK		
5. Generator's Name and Mailing Address RELCO LOCOMOTIVE 1 RELCOWAY ALBIA IA 52531				Generator's Site Address (if different than mailing address)			
Generator's Phone: 641 932-3521							
6. Transporter 1 Company Name ALPONT TRANSPORTATION LLC				U.S. EPA ID Number PAR000504944			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO IN 46312				U.S. EPA ID Number IND0000648943			
Facility's Phone: 219 387-3951							

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			D001	F003	F005
X	1RQ. Waste Paint Related Material (D001,F003,F005) 3. UN1263, II (ERG 128)	008	DM	440	G			

14. Special Handling Instructions and Additional Information
 STREAM# 293410

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
 I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name: Charles W. Shelton Signature: [Signature] Month: 11 Day: 27 Year: 06

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____
 Transporter signature (for exports only): _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials
 Transporter 1 Printed/Typed Name: Daniel K. Shelton Signature: [Signature] Month: 11 Day: 27 Year: 06
 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____

18. Discrepancy
 18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
 Manifest Reference Number: _____

18b. Alternate Facility (or Generator) U.S. EPA ID Number: _____
 Facility's Phone: _____

18c. Signature of Alternate Facility (or Generator) Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
 1. _____ 2. _____ 3. _____ 4. _____

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location RELCO LOCOMOTIVE 1 RELCOWAY ALBIA, IA 52531

EPA ID Number IAR000506105 Manifest Number 000069428JJK

Waste Analysis Available Yes No X On file at facility Date 11-27-06

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES List all applicable constituents from key below	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039 List all applicable constituents from Table I and/or key below
				Nonwastewater >1% TOC & >1% TSS	Wastewater		
a	b	c	d	e	f	g	h
293410		D001, F003, F005		X			32, 26

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|--------------------------------|-----------------------------------|----------------------------|-------------------------------------------|
| 1) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 2) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 3) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 4) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 5) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 6) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 7) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Chuck Osborn

Print Name Chuck Osborn

835 4985 / 502892

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

1 A R 0 0 0 5 0 8 1 0 5 8 1 0 0 6

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

RELCO LOCOMOTIVE
1 RELCOWAY
ALBIA IA 52531

4. Generator's Phone (0 4 1) 9 3 2 - 3 5 2 1

A. State Manifest Document Number

81606 IN

B. State Generator's ID

5. Transporter 1 Company Name

ALPONT TRANSPORTATION LLC

6. US EPA ID Number

1 A R 0 0 0 5 0 4 9 4 4

C. State Transporter's ID

D. Transporter's Phone 724 981-4198

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVENUE
EAST CHICAGO IN 46312

10. US EPA ID Number

1 I N D 0 0 0 0 6 4 6 9 4 3

G. State Facility's ID

H. Facility's Phone 219 397-3951

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers No. Type

13. Total Quantity

14. Unit Wt/Vol

Waste No.

HM

a. X RQ Waste Paint Related Material
3. UN1253, II

008 DM

44.0 G

D001
F003
F005

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a) (7) STREAM 233410 EROSION

K. Handling Codes for Wastes Listed Above

501

15. Special Handling Instructions and Additional Information

24 HOUR EMERGENCY PHONE: INFOTRAC 800-535-5053

RELCO: 641-932-3521

C# 29968B

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

DAVID ADLER

Signature

David Adler

Month Day Year

10-8-11-06

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DAVID RUARK

Signature

David Ruark

Month Day Year

10-8-11-06

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Lisa Droege-meier

Signature

Lisa Droege-meier

Month Day Year

10-8-25-06

ORIGINAL — RETURN TO GENERATOR

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

1 AR 00050010581000

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

RELCO LOCOMOTIVE
1 RELCOWAY
ALBIA IA 52530

4. Generator's Phone (041) 032-3521

5. Transporter 1 Company Name

ALPONT TRANSPORTATION LLC

6. US EPA ID Number

PAR 000504044

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVENUE
EAST CHICAGO IN 46312

10. US EPA ID Number

IND 0000040943

A. State Manifest Document Number

81505

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 724-861-4188

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

219-397-3551

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

a. ~~NO Waste Pallet Related Material~~
X 1. UN1263, II

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol

Waste No.

008 DM

44.0 G

0001

F003

F003

J. Additional Descriptions for Materials Listed Above

3. (3) STREAM 2000000000

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

24 HOUR EMERGENCY PHONE: INEOTRAC 800-535-5052

RELCO: 641-932-3521

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

DAVID ADLER

[Signature]

10/8/21/06

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

DAVID RYAN

[Signature]

10/8/21/06

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

GENERATOR'S COPY

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location RELCO LOCOMOTIVE 1 RELCOWAY ALBIA, IA 52531

EPA ID Number IAR000506105 Manifest Number 81606

Waste Analysis Available Yes No X On file at facility

Date 8-21-06

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Nonwastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
293410		D001, F003, F005		X			32, 26

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|-------------------------------------------|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butly Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature DAVID ADLER

Print Name DAVID ADLER

8354985/502892

Emergency Contact Telephone Number

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

I A R 0 0 0 5 0 6 1 0 5 0 6 1 5 6

Manifest
Document No.2. Page 1
of 1Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

RELCO LOCOMOTIVE

1 RELCOWAY

ALBIA IA 52531

4. Generator's Phone (6 4 1) 9 3 2 - 3 5 2 1

A. State Manifest Document Number

06158IN

B. State Generator's ID

5. Transporter 1 Company Name

ALPONT TRANSPORTATION LLC

US EPA ID Number

P A R 0 0 0 5 0 4 9 4 4

C. State Transporter's ID

OHUPW-06191

D. Transporter's Phone

724 981-4198

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE

EAST CHICAGO IN 46312

10. US EPA ID Number

I N D 0 0 0 6 4 6 9 4 3

G. State Facility's ID

H. Facility's Phone

219 397-3951

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

a. X RQ Waste Flammable solids, organic, n.o.s.

(Toluene, Xylene)

4.1, UN1325, III

12. Containers

No.

Type

8 DM

13. Total
Quantity

440

G

14. Unit
Wt/Vol

G

I. Waste No.

B001

F003

F005

GENERATOR

K. Handling Codes for Wastes Listed Above

501

15. Special Handling Instructions and Additional Information

24 HOUR EMERGENCY PHONE: INFOTRAC 800-535-5053

RELCO: 641-932-3521

C# 29959A

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

DAVID ADLER

Signature

DAVID ADLER

Month Day Year

10/6/90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

TIM BOIT

Signature

TIM BOIT

Month Day Year

10/6/90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Lisa Droege-meier

Signature

Lisa Droege-meier

Month Day Year

10/6/90

ORIGINAL — RETURN TO GENERATOR

Attachment 11 Page 9 of 12

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **1-A-R-0-0-0-5-0-6-1-0-5**
 Manifest Document No. **3-2-7-0-6**

2. Page 1 of 1
 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

RELCO LOCOMOTIVE

1 RELCOWAY

ALBIA, IA 52531

4. Generator's Phone

841-932-3521

5. Transporter 1 Company Name

Alpert Transportation, LLC

6. US EPA ID Number

1-P-A-R-0-0-0-5-0-4-9-4-4

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE

EAST CHICAGO, IN 46312

10. US EPA ID Number

1-I-N-D-0-0-0-6-4-6-9-4-3

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM	No.	Type	Total Quantity	Unit Wt/Vol	Waste No.
a. X	3	UN253, H	55	G	D001 F003 F005
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

a. (L) STREAM 23410 FROM 12

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

24 HOUR EMERGENCY PHONE: INFOTRAC 800-535-5053 RELCO: 641-932-3521

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **DAVID ADLER** Signature **[Signature]** Month Day Year **10-31-70-6**

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name **Tom Bolt** Signature **[Signature]** Month Day Year **3-2-706**

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name _____ Signature _____ Month Day Year _____

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name **Lisa Dissemmer** Signature **[Signature]** Month Day Year **10-31-106**

ORIGINAL - RETURN TO GENERATOR

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. I.A.R.0.0.0.5.0.0.1.0.5.3.2.7.0.0		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address RELCO LOCOMOTIVE 1 RELCOWAY ALBA IN 47231						A. State Manifest Document Number							
4. Generator's Phone (841) 932-3521						B. State Generator's ID							
5. Transporter 1 Company Name Alpert Transportation, LLC						C. State Transporter's ID							
6. US EPA ID Number P.A.R.0.0.0.5.0.4.0.4.4						D. Transporter's Phone 724 981-3771							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO IN 46312						G. State Facility's ID							
10. US EPA ID Number I.N.D.0.0.0.0.6.4.0.9.4.3						H. Facility's Phone 219 307-3051							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. RC Waste Paint Related Material S, UN1263, II						No. Type							
b. RC Waste Paint Related Material S, UN1263, II						00.4 DM		55		G		D001 F003 F005	
c. RC Waste Paint Related Material S, UN1263, II													
d. RC Waste Paint Related Material S, UN1263, II													
J. Additional Descriptions for Materials Listed Above a. (3) STREAM 22000 PROMER						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information 24 HOUR EMERGENCY PHONE: TROPAC 800-525-5053 RELCO: 641-932-3521													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name DAVID ADLER						Signature <i>[Signature]</i>				Month Day Year 4 26 2006			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tim Bolt						Signature <i>[Signature]</i>				Month Day Year 3 27 06			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature				Month Day Year			

GENERATOR'S COPY

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location RELCO LOCOMOTIVE 1 RELCOWAY ALBIA, IA 52531

EPA ID Number IAR000506105 Manifest Number 32706

Waste Analysis Available Yes No X On file at facility Date _____

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS F001*, D002, D012-D001-F005 & F009
a	b	c	d	Nonwastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table II and/or key below h
293410		D001, F003, F005		X			32, 26

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB \geq 50 ppm 2) Halogenated Organic Carbon (HOC's) \geq 1000 mg/l 3) Nickel (Ni) \geq 134 mg/l 4) Thallium (TI) \geq 13

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|-------------------------------------|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoro |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

[Handwritten Signature]

Print Name

DAVID ADLER

Attachment 12

Hazardous Waste Analytical Profiles



POLLUTION CONTROL INDUSTRIES

Page 1 of 2

Please indicate which PCI Facility(s) are being utilized for this Profile

☐ East Chicago, IN. 46310 ☐ Millington, TN. 38053 ☐ Rancho Cordova, CA. 95670
1-800-388-7242 1-888-724-8368 1-866-724-2272

PROFILE NUMBER

293410

GENERATORS WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

PLEASE FAX COMPLETED FORM TO THE PCI APPROVALS DEPARTMENT AT 1-219-397-5411

A. GENERATOR INFORMATION:

Generator Name: Relco Locomotive
Facility Address: 1 Relco Way
City: Albia State: IA Zip: _____
Customer Name: Kurt Detweiler
Customer Phone: (641) 932-3521
Customer Fax: (641) 932-3375
Generator USEPA/Federal ID #: TAR 000506105
Generator State ID # (if applicable): _____

Is the Generator a "Conditionally Exempt Small Quantity Generator"? ☐ Yes ☒ No

Generator's S.I.C. Code (4 Digit): _____

B. WASTE STREAM INFORMATION:

Name of the Waste: Wash Paints Thinner
Original Process Generating Waste: Painting, Gun Clean up

Is a representative sample provided? ☐ Yes ☒ No
Is there any Analytical attached? TCLP ☐ Yes ☒ No
Is a MSDS attached? ☐ Yes ☒ No
Other ☐ Yes ☒ No

C. GENERAL CHARACTERISTICS:

Color: None Physical state @ 70 F: 90 % Liquid 10 % Gas (Aerosol)
Odor: Mild 10 % Sludge 0 % Gas (Other)
Strong 0 % Solid 0 % Other
Phases: ☐ Single Layer ☒ Multi Layer
How Many? 2 Btu/Lb: 5000-10,000

PH: <2.0 2.0 to 4.0 X 4.0 to 10.0 10.0 to 12.5 >12.5
Liquid Flash Point: <73 F 73 to 99 F X 100 to 139 F 140 to 200 F >200 F None
Specific Gravity: _____ % Total Halogens: _____

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	Constituents	Min%	Max%
<u>Paint</u>	<u>50</u>				
<u>Thinner Toluene & Xylene</u>	<u>50</u>				

E. OTHER WASTE STREAM INFORMATION:

Is this waste a "USED OIL" per 40CFR PART 279? ☐ Yes ☒ NoIf "Yes", does the total halogen content exceed 1,000 ppm? ☐ Yes ☒ NoIf "Yes", can you identify the "Chlorinated Constituent" present in the oil? ☐ Yes ☒ NoIf "Yes", can you rebut the presumption that this material is a "Hazardous Waste"? ☐ Yes ☒ No

Does the Waste have any of the following characteristics? (Please check all that apply)

☐ Oxidizer ☐ Organic Peroxide ☐ Water Reactive ☐ Air Reactive ☐ Pyrophoric ☐ Dioxin
☐ Radioactive ☐ Infectious ☐ Pathogen ☐ Carcinogen ☐ Etiological
☐ Explosive ☐ Shock Sensitive ☐ Undergo Hazardous Polymerization ☐ Cylinder ☐ Aerosols

Does the Waste contain any of the following?

☒ None or LESS THAN or ACTUAL ☒ None or LESS THAN or ACTUAL
PCB'S <50ppm _____ ppm Sulfides <50ppm _____ ppm
Cyanides <50ppm _____ ppm Phenolics <50ppm _____ ppm

Does the waste represented by this profile contain benzene?

☐ Yes ☒ No

If "Yes", please list concentration in _____ ppm.

Is the Waste subject to the benzene waste operations NESHAP? (40CFR Part 61, Subpart FF) ☐ Yes ☒ No

Answer "Yes" if your waste contains benzene and if the SIC code from your facility is one of the following:

2812 2813 2815 2819 2821 2822 2823 2824 2833 2834 2835 2836 2841 2842 2843 2844 2851

Attachment 12 Page 1 of 4 CSP

E. OTHER WASTE STREAM INFORMATION CONTINUED:

Is the Waste subject to RCRA Subpart CC controls? (40 CFR 265 SUBPART CC)

☒ Yes ☐ No

If "No", does the Waste meet the organic LDR exemption for UHC'S? (40 CFR 268.48, 268.7)

☒ Yes ☐ No

If "No", does the Waste contain <500ppmw volatile organic(VO)? (40 CFR 265 SUBPART CC)

☒ Yes ☐ No

Does the Waste contain any Class I or Class II ozone-depleting substances?

☐ Yes ☒ No

If PCB'S are present, is the waste regulated by TSCA per 40 CFR 761?

☐ Yes ☒ No**F. SHIPPING INFORMATION:**

Method of Shipment:

☐ Bulk Liquid(> 500 Gallons) ☐ Bulk Solids(roll-off box, vacuum box, etc) ☐ Lab Pack☐ Cubic Yard Boxes ☐ Totes (Please specify size) _____☒ Drums(Specify size) 85 ☒ 55 ☐ 30 ☐ 16 ☐ 5 Other (Please specify) _____Container Type: ☒ Metal ☐ Plastic ☐ Fiberboard ☐ Combination(EX: Glass containers in metal drum)☐ Other(Please describe) _____

Shipping Frequency:

Number of Units 4 Per ☐ Month ☒ Quarter ☐ Year ☐ Other _____**G. R.C.R.A. CHARACTERIZATION:**

Is this a USEPA "Hazardous Waste" per 40CFR 261.3?

☒ Yes ☐ No

If "No", Please skip to section H.

Is this a "Universal Waste" per 40CFR part 273?

☐ Yes ☒ No

Is this a "Characteristic Waste"?

☒ Yes ☐ NoIf "Yes" Is it: ☒ D001 Ignitable ☐ D002 Corrosive ☐ D003 ReactiveCharacteristic for Toxic Metals: ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011

Characteristic for Toxic Organics: D012 thru D043 (please list all that apply) _____

Is this an "F" or "K" Listed waste or mixed with one?

☒ Yes ☐ NoIf "Yes", Please list all applicable code(s) from 40CFR261.31 and/or 261.32: F003, F005

Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (e) or (f)?

☐ Yes ☐ No

If "Yes", Please list all applicable waste code(s): _____

Is this a state regulated waste?

☒ Yes ☐ NoIf "Yes", Please list all codes: D001, F003, F005**H. DOT SHIPPING INFORMATION:**

Is this a U.S. Dept. of Transportation(USDOT) Hazardous Material?

☒ Yes ☐ NoProper Shipping Name per 49CFR 172.101 Hazardous Materials Table: POWDER PAINT RELATED MATERIAL

"Reportable Quantity"(if any) _____ lbs

Hazard Class or Division No. 3 ☒ UN/NA # 1263 Packing Group ☐ I ☒ II ☐ III

Is this a "Poison Inhalation Hazard"?

☐ Yes ☐ NoIf "Yes", Please indicate Hazard Zone ☐ Zone A ☐ Zone B ☐ Zone C ☐ Zone D ☐ OtherList two primary hazardous constituents: Xylene, Toluene, PAINT**I. GENERATOR CERTIFICATION:**

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

Name(print) Kurt DetweilerTitle MANSignature Kurt DetweilerDate 3-24-06**THIS SPACE FOR PCI APPROVALS DEPARTMENT ONLY**DATE RECEIVED 3/24/06

APPROVER'S INITIALS _____

PROFILE NUMBER

PROCESS CODE _____

PRICE _____

TRANS _____

293410

PROPER WASTE CODES _____

PROPER D.O.T. SHIPPING NAME: _____

HAZARD CLASS _____ UN _____ NA _____ PACKING GROUP ☐ I ☐ II ☐ III

N.O.S. DESCRIPTORS _____

YARD INSTRUCTIONS:

☐ NO LANDFILL CUSTOMER☐ NO SAMPLE APPROVAL

FORM CODE W

SYSTEM CODE H

☐ RUN SALES ANALYTICAL☐ N/H FOR METALS PER GEN.☐ RUN OX. SCREEN ON INCOMING☐ MSDS ATTACHED☐ SEE ATTACHED ANALYTICAL☐ RUN COMP. ON INCOMING



POLLUTION CONTROL INDUSTRIES

Page 1 of 2

Please indicate which PCI Facility(s) are being utilized for this Profile

☐ East Chicago, IN. 46310☐ Millington, TN. 38053☐ Rancho Cordova, CA. 95670

1-800-388-7242

1-888-724-8366

1-866-724-2272

PROFILE NUMBER

293423

GENERATORS WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

PLEASE FAX COMPLETED FORM TO THE PCI APPROVALS DEPARTMENT AT 1-219-397-6411

Tom Taylor 502892

A. GENERATOR INFORMATION:

Generator Name: Kelco LocomotiveFacility Address: 1 Kelco WayCity: Albion State: LA Zip: 52531Customer Name: Kurt DeFuriaCustomer Phone: (641) 932-3521Customer Fax: (641) 932-3375Generator USEPA/Federal ID #: TAR 000506105

Generator State ID # (If applicable): _____

Is the Generator a "Conditionally Exempt Small Quantity Generator"? Yes ☒ No ☐

Generator's S.I.C. Code(4 Digit): _____

B. WASTE STREAM INFORMATION:

Name of the Waste: Paint SolidsOriginal Process Generating Waste: Filter & Paint Chips PaintingIs a representative sample provided? Yes ☐ No ☒Is there any Analytical attached? TCLP Yes ☐ No ☒Is a MSDS attached? Yes ☐ No ☒Other Yes ☐ No ☒

C. GENERAL CHARACTERISTICS:

Color: 6000 Physical state @ 70 F _____ Phases _____ Btu/Lb _____

Odor: _____ % Liquid _____ % Gas(Aerosol) _____ Single Layer _____ <3000

X None _____ % Sludge _____ % Gas(Other) _____ Multi Layer _____ 3000-5000

Mild 100 % Solid _____ % Other _____ How Many? X 5000-10,000

Strong _____ % Powder _____ >10,000

PH: _____ <2.0 _____ 2.0 to 4.0 X 4.0 to 10.0 _____ 10.0 to 12.5 _____ >12.5Liquid Flash Point: _____ <73 F _____ 73 to 99 F _____ 100 to 139 F _____ 140 to 200 F _____ >200 F X None

Specific Gravity _____ % Total Halogens _____

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	Constituents	Min%	Max%
<u>PAINT FILTERS</u>	<u>30</u>				
<u>PAINT CHIPS</u>	<u>70</u>				

E. OTHER WASTE STREAM INFORMATION:

Is this waste a "USED OIL" per 40CFR PART 279? Yes ☐ No ☒If "Yes", does the total halogen content exceed 1,000 ppm? Yes ☐ No ☒

If "Yes", can you identify the "Chlorinated Constituent" present in the oil? _____

If "Yes", can you rebut the presumption that this material is a "Hazardous Waste"? Yes ☐ No ☒

Does the Waste have any of the following characteristics? (Please check all that apply)

☐ Oxidizer ☐ Organic Peroxide ☐ Water Reactive ☐ Air Reactive ☐ Pyrophoric ☐ Dioxin

☐ Radioactive ☐ Infectious ☐ Pathogen ☐ Carcinogen ☐ Etiological

☐ Explosive ☐ Shock Sensitive ☐ Undergo Hazardous Polymerization ☐ Cylinder ☐ Aerosols

Does the Waste contain any of the following?

None or LESS THAN or ACTUAL None or LESS THAN or ACTUAL

PCB'S	<50ppm	ppm	Sulfides	<50ppm	ppm
Cyanides	<50ppm	ppm	Phenolics	<50ppm	ppm

Does the waste represented by this profile contain benzene? Yes ☐ No ☒

If "Yes", please list concentration in _____ ppm.

Is the Waste subject to the benzene waste operations NESHAP? (40CFR Part 61, Subpart FF) Yes ☐ No ☒

Answer "Yes" if your waste contains benzene and if the SIC code from your facility is one of the following:

2812 2813 2816 2819 2821 2822 2823 2824 2833 2834 2835 2836 2841 2842 2843 2844 2851

Attachment 12 Page 3 of 4

E. OTHER WASTE STREAM INFORMATION CONTINUED:

Is the Waste subject to RCRA Subpart CC controls? (40 CFR 265 SUBPART CC)

☒ Yes ☐ No

If "No", does the Waste meet the organic LDR exemption for UHC'S? (40 CFR 268.48, 268.7)

☐ Yes ☐ No

If "No", does the Waste contain <500ppmw volatile organic(VO)? (40 CFR 265 SUBPART CC)

☐ Yes ☐ No

Does the Waste contain any Class I or Class II ozone-depleting substances?

☐ Yes ☒ No

If PCB'S are present, is the waste regulated by TSCA per 40 CFR 761?

☐ Yes ☒ No**F. SHIPPING INFORMATION:**

Method of Shipment:

☐ Bulk Liquid(> 500 Gallons)☐ Bulk Solids(roll-off box, vacuum box, etc)☐ Lab Pack☐ Cubic Yard Boxes☐ Totes (Please specify size) _____☒ Drums(Specify size) 85 55 30 16 5 Other (Please specify) _____Container Type: ☒ Metal ☐ Plastic ☐ Fiberboard ☐ Combination(EX: Glass containers in metal drum)☐ Other(Please describe) _____

Shipping Frequency:

Number of Units ✓ Per Month ☒ Quarter ☐ Year ☐ Other _____**G. R.C.R.A. CHARACTERIZATION:**

Is this a USEPA "Hazardous Waste" per 40CFR 261.3?

☒ Yes ☐ No

If "No", Please skip to section H.

Is this a "Universal Waste" per 40CFR part 273?

☐ Yes ☐ No

Is this a "Characteristic Waste"?

☐ Yes ☐ NoIf "Yes" Is it: ☒ D001 Ignitable ☐ D002 Corrosive ☐ D003 ReactiveCharacteristic for Toxic Metals: ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011

Characteristic for Toxic Organics: D012 thru D043 (please list all that apply) _____

Is this an "F" or "K" Listed waste or mixed with one?

☐ Yes ☒ NoIf "Yes", Please list all applicable code(s) from 40CFR261.31 and/or 261.32: F003, F005

Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" waste code under

40CFR 261.33 (e) or (f)?

☐ Yes ☒ No

If "Yes", Please list all applicable waste code(s): _____

Is this a state regulated waste?

☒ Yes ☐ NoIf "Yes", Please list all codes: D001**H. DOT SHIPPING INFORMATION:**

Is this a U.S. Dept. of Transportation(USDOT) Hazardous Material?

☒ Yes ☐ NoProper Shipping Name per 49CFR 172.101 Hazardous Materials Table: NO WASTE FLAMMABLE SOLID, ORGANIC, N.O.S.

"Reportable Quantity"(if any) _____ lbs

Hazard Class or Division No. 4.1 UN NA # 1325 Packing Group ☐ I ☐ II ☒ III

Is this a "Poison Inhalation Hazard"?

☐ Yes ☐ NoIf "Yes", Please indicate Hazard Zone ☐ Zone A ☐ Zone B ☐ Zone C ☐ Zone D ☐ OtherList two primary hazardous constituents: Toluene, Xylene, Paint**I. GENERATOR CERTIFICATION:**

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

Name(print) Kurt DetwilerTitle MgrSignature Kurt DetwilerDate 3-24-06**THIS SPACE FOR PCI APPROVALS DEPARTMENT ONLY**

DATE RECEIVED _____

APPROVER'S INITIALS _____

PROCESS CODE _____

PRICE _____ TRANS _____

PROPER WASTE CODES _____

PROFILE NUMBER

293423

PROPER D.O.T. SHIPPING NAME: _____

HAZARD CLASS _____ UN _____ NA _____ PACKING GROUP ☐ I ☐ II ☐ III

N.O.S. DESCRIPTORS _____

YARD INSTRUCTIONS:

☐ NO LANDFILL CUSTOMER☐ RUN SALES ANALYTICAL☐ MSDS ATTACHED☐ NO SAMPLE APPROVAL☐ N/H FOR METALS PER GEN.☐ SEE ATTACHED ANALYTICAL☐ RUN OX. SCREEN ON INCOMING☐ RUN COMP. ON INCOMING

FORM CODE W

SYSTEM CODE V

Attachment 12 Page 4 of 4